

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

BLACKBEARD OPERATING, LLC,	§	
	§	
<i>Plaintiff,</i>	§	Civil Action No. _____
	§	
v.	§	
	§	
SANGUINE GAS EXPLORATION, LLC,	§	
	§	
<i>Defendant.</i>	§	

**NOTICE OF REMOVAL OF ACTION**

TO: THE UNITED STATES DISTRICT COURT FOR NORTHERN DISTRICT OF TEXAS, FORT WORTH DIVISION; THE DISTRICT COURT OF TARRANT COUNTY, TEXAS, 153rd JUDICIAL DISTRICT; AND BLACKBEARD OPERATING, LLC.

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant Sanguine Gas Exploration, LLC (“Defendant”) hereby notices removal of the action styled *Blackbeard Operating, LLC v. Sanguine Gas Exploration, LLC*, Cause No. 153-343324-23, from the District Court of Tarrant County, Texas, 153rd Judicial District, to the United States District Court for the Northern District Texas, Fort Worth Division.

1. The United States District Court for the Northern District of Texas, Fort Worth Division, has original jurisdiction over this matter pursuant to 28 U.S.C §1332. This action is removable pursuant to 28 U.S.C. §1441, as it is a civil action between citizens of different states and the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

2. This action is removable to this Court, as this Court is the district embracing the place where the state court action is pending. 28 U.S.C. § 1441(a).

3. On June 29, 2023, an action was commenced in the District Court of Tarrant County of the State of Texas, 153rd Judicial District, captioned *Blackbeard Operating, LLC v. Sanguine*

*Gas Exploration, LLC* (“State Court Action”). In accordance with 28 U.S.C. § 1446(a) and Local Rule 81.1, a copy of the petition that was filed in the State Court Action is attached as Exhibit "A," together with a copy of the docket sheet and all other filings in the State Court Action.

4. Defendant was provided with a copy of Plaintiff’s Original Petition on June 29, 2023. This Notice of Removal has been filed within thirty days after receipt by Defendant of a copy of the initial pleading setting forth the claim for relief. Accordingly, this Notice of Removal is timely under 28 U.S.C. § 1446(b)(1).

5. The District Court for Tarrant County, Texas is located within the United States District for the Northern District of Texas, Fort Worth Division. Accordingly, venue is proper in the Northern District of Texas pursuant to 28 U.S.C. § 1446(a).

6. Plaintiff Blackbeard Operating, LLC (“Plaintiff”), alleges in its Petition that it is a Delaware limited liability company with its principal office located in Fort Worth, Texas.

7. Defendant is a single member Oklahoma limited liability company with its principal place of business in Tulsa, Oklahoma.

8. Defendant’s single member, Randolph Nelson, is a resident of New York State. Defendant inquired of Plaintiff regarding the citizenship of its members, and Defendant has not reported any New York membership.

9. Accordingly, upon information and belief, complete diversity of citizenship exists between Plaintiff and Defendant, pursuant to 28 U.S.C. § 1332(a)(2).

10. Plaintiff alleges in its Petition that it is entitled to relief in an amount in excess of \$75,000, which exceeds the amount required for diversity jurisdiction under 28 U.S.C. § 1332. *See* Exhibit A.

11. In accordance with 28 U.S.C. § 1446(d), a copy of this Notice of Removal of Action is being served on all parties to the action and filed with the Clerk of the District Court of Tarrant County of the State of Texas, 153rd Judicial District Division.

WHEREFORE, Sanguine Gas & Exploration, LLC hereby gives notice that the above-referenced action pending against it in the District Court of Tarrant County of the State of Texas, 153rd Judicial District, has been removed to this Court. Defendant reserves the right to amend or supplement this Notice of Removal.

RESPECTFULLY SUBMITTED,

/s/Mary M. Melle

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Sanguine Gas & Exploration, LLC  
Pro Hac Application to be filed*

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on July 28, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the applicable ECF registrants. I further certify this document was served by electronic mail on July 28, 2023.

/s/ Mary M. Melle